UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

DEC 15 2016

Tita Lagrimas
Executive Vice President of Regulatory Affairs
Tradebe Treatment and Recycling, LLC
1433 East 83rd Avenue, Suite 200
Merrillville, Indiana 46410
tita.lagrimas@tradebe.com

Re: Request for Information
Tradebe Treatment and Recycling, LLC
East Chicago, Indiana, IND 000 646 943

Dear Ms. Lagrimas:

The U.S. Environmental Protection Agency, Region 5 is in the process of consulting with EPA Headquarters regarding the exemption status of the Solids Distillation System (SDS) operated by Tradebe Treatment and Recycling, LLC (Tradebe), at the facility located at 4343 Kennedy Avenue in East Chicago, Indiana (Facility), under the Resource Conservation and Recovery Act (RCRA).

We have reviewed the SDS-related information previously provided by Tradebe by letter dated October 18, 2016, pertaining to this issue.

Based on our review of the October 18, 2016 information, EPA Region 5 is requesting additional data and information relating to process operations and hazardous waste activities at the Facility.

Please respond separately to each of the questions listed below. For each Request asking for mean and maximum values, please respond on the basis of hourly rates for each of the five calendar years 2011 through 2015.

1. **PBI / Ex. 4**

2. PBI / Ex. 4

3. PBI / Ex. 4

4. PBI / Ex. 4

5. PBI / Ex. 4

6. PBI / Ex. 4

7. The following pertain to the carbon beds downstream of the shredder and upstream of the two-inch by two-inch metals screen; immediately following the oil-water separator (OWS) downstream of the vapor recovery unit (VRU); and the carbon bed which serves as a back-up to the VRU when the flare is bypassed. For each carbon bed, provide: (i) diameter and depth of carbon bed; (ii) adsorption isotherms (from vendor); (iii) mean and maximum hydrocarbon concentrations at the inlet; (iv) mean and maximum hydrocarbon concentrations at breakthrough; (v) mean and maximum volumetric air flowrate into the carbon bed; (vi) mean and maximum air temperature into the carbon bed; (vii) means by which breakthrough is monitored, including typical breakthrough set point; and (viii) frequency of bed change-out.

8. Describe the various types of waste streams, liquid, solid or otherwise, that are introduced to the SDS, typical sources of these wastes and the most common types of hydrocarbons (e.g., spent solvents including toluene, xylene, etc.) that are fed into the SDS.

9. PBI / Ex. 4

10. PBI / Ex. 4

11. PBI / Ex. 4

12. PBI / Ex. 4

13. PBI / Ex. 4

14. PBI / Ex. 4

15. PBI / Ex. 4

16. Does start-up and shut-down of the SDS process occur when waste is in the system or only when alternative fuel is used? If Tradebe does not use "clean start-up" (i.e., only when natural gas or fuel oil or other non-waste derived fuel is being used), provide a percentage of time dedicated to start-up/shut-down of the overall time the SDS is in operation.

17. PBI / Ex. 4

18. What is the destruction and removal efficiency (DRE) of the flare? How does Tradebe ensure this DRE is maintained? What measures are taken when the DRE falls below its permit-allowable DRE? What is the design capacity of the flare?

19. PBI / Ex. 4

20. PBI / Ex. 4

21. In the process flow diagram referred to in Request 1 Tradebe shows a sludge stream from the sludge discharge tanker. What is the hydrocarbon content of this stream? How is this stream managed?

22. Tradebe's October 18, 2016 submittal includes Tradebe's degreaser sales volume for 2015 as well as quantity of SDS process water to fuel on a month-to-month basis for 2015. When combined the ratio of process water (fuel blend) to reclaimed solvents for sale is approximately 2.2:1. The SDS Process Flow Diagram mentioned in Request 1 shows a water to degreaser hourly mass flow ratio of approximately 1.1:1. This is nearly a 100% difference in ratios. Explain the reason for such a variation.

23. PBI / Ex. 4

24. For the solvent degreaser referred to in Request 23, provide product specifications and Material Safety Data Sheets for same. Also, identify any comparable products available to end users for sale from other markets.

25. PBI / Ex. 4

26. For the SDS fuels discussed in Request 25, what further blending and/or processing do they undergo once they are trucked away from the SDS? What are the minimum acceptance criteria by Essroc Cement Corporation, Cadence Environmental Energy and any other end-user of Tradebe's blended fuels?

Your cooperation and response for this matter is highly appreciated. Please provide your response to:

U.S. Environmental Protection Agency, Region 5
Attention: Jae Lee
77 West Jackson Boulevard
Mail Code LR-8J
Chicago, Illinois 60604

You may, under 40 C.F.R. Part 2 Subpart B, assert a business confidentiality claim covering all or part of the information in the manner described in 40 C.F.R. § 2.203(b). We will disclose the information covered by a business confidentiality claim only to the extent and by means of the procedures at 40 C.F.R. Part 2, B. You must make any request for confidentiality when you submit the information since any information not so identified may be made available to the public without further notice.

This request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 et seq., because it does not seek collection of information from 10 or more persons.

If you have any questions in this matter, please contact Mr. Jae Lee, of my staff, at (312) 886-3781.

Sincerely,

Mary Setnicar, Chief
RCRA/TSCA Programs Section
RCRA Branch

cc: Craig Schroer, Indiana Department of Environmental Management (cschroer@idem.IN.gov)